

**UNITED STATES DISTRICT COURT**  
for the  
Eastern District of Michigan

United States of America  
v.  
Barron Terrell Davenport

Case No.

Case: 2:23-mj-30361  
Assigned To : Unassigned  
Assign. Date : 8/30/2023  
Description: COMP USA V. SEALED  
MATTER (KB)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 2020 to May 2021 in the county of Wyane in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section*  
18 U.S.C. § 1349

*Offense Description*  
Conspiracy to Commit Wire Fraud

This criminal complaint is based on these facts:

☐ Continued on the attached sheet.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: August 30, 2023

City and state: Detroit, MI

  
Complainant's signature

Jeffrey Weiland, Special Agent

*Printed name and title*

  
Judge's signature

R. Steven Whalen, United States Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Jeffrey Weiland, being duly sworn, states as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI), and have been so employed since September 2007. I am currently assigned to the Public Corruption and Government Fraud squad in the Detroit Division of the FBI. As a Special Agent, I have investigated crimes including the corruption of state and local officials, arson, forced labor trafficking, racketeering and violations of the Foreign Agents Registration Act. During these investigations, I have been the affiant on search warrants for businesses, residences and electronic mail (e-mail) accounts. I have also conducted investigations using consensual recordings, undercover operations, Title III wiretaps and techniques authorized under the Foreign Intelligence Surveillance Act (FISA).

2. This affidavit is submitted in support of a criminal complaint charging Barron Terrell Davenport for violating Title 18, United States Code § 1349, Conspiracy to Commit Wire Fraud.

3. The facts in this affidavit come from the U.S. Department of Labor, the U.S. Small Business Administration, Federal Grand Jury subpoenas, search warrants and court orders issued pursuant to 18 U.S.C. § 2703(d). Because I am submitting this affidavit for the limited purpose of establishing probable cause in support of a criminal complaint, I have not included every fact known to me

concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that Davenport conspired with others known and unknown to commit wire fraud.

4. The FBI, Department of Labor-Office of Inspector General (DOL-OIG) and Small Business Administration-Office of Inspector General (SBA-OIG) are investigating individuals known and unknown for fraudulently obtaining federal dollars earmarked for pandemic relief. One of the individuals involved is Davenport.

5. The individuals filed at least 575 claims for benefits under the SBA's Economic Injury Disaster Loan (EIDL) program. They also applied for loans through the SBA's Paycheck Protection Program (PPP). During the same time, they filed at least 1,000 claims for Unemployment Insurance (UI) benefits which paid out more than \$5,000,000. I believe most of these SBA and UI claims were fraudulent and/or used stolen identities.

6. On April 26, 2023, a federal grand jury in the Eastern District of Michigan indicted eight individuals for Conspiracy to Commit Wire Fraud and Aggravated Identity Theft (Case No. 23-CR-20253). Three of those individuals – DeAngelo Jackson-Portwood, Timothy Boyle and Tyrone Boyle – have significant telephone contacts with Davenport. Davenport received a fraudulent PPP loan as part of the scheme. Additionally, 108 UI claims filed by the conspirators listed

Davenport's residence as the claimant's address. These 108 UI claims were filed from an IP address in Michigan. The Bank of America centers used to process UI claims were located in Virginia and Texas.

7. The investigation began when the FBI received a complaint from an individual that a PPP loan was applied for in his/her company name without his/her knowledge or consent. The PPP loan application listed the applicant's telephone number as 313-948-2740. The SBA determined that 24 PPP applications and 265 EIDL applications had listed 313-948-2740 as the applicant's telephone number. The listed subscriber for 313-948-2740 was a fictitious character. The FBI compared cell-site data from 313-948-2740 and 248-954-7884, used by Jackson-Portwood. The analysis sought to identify when the two cellphones were in a common location, defined as when the cellphones were used within three miles of each other during the same hour. During the period May 20, 2020 to November 27, 2020, the two cellphones were in a common location 1,756 times. Based on this overlap, I believe Jackson-Portwood used telephone number 313-948-2740.

8. In addition to all listing 313-948-2740 as the applicant's telephone number, the 265 EIDL applications contained other indicators of fraud: 256 claims listed February 10, 2019 as the date the business was established; 73 claims listed gross business revenues of \$99,546; and 72 claims listed gross business revenues of \$124,293. The 265 EIDL applications listing 313-948-2740 were submitted

electronically using seven IP addresses. When the SBA searched its database for EIDL claims from those seven IP addresses, the SBA identified 575 EIDL claims (including the 265 claims previously identified). Many of these 575 claims contained the same indicators of fraud as the 265 claims listing telephone number 313-948-2740.

9. Agents have interviewed more than ten people who had their identities used for SBA loans and/or UI claims without their permission. While these individuals had their identities stolen, I also believe that a number of individuals permitted fraudulent SBA claims to be filed in their names. The latter set of individuals expected to receive some of the proceeds of the fraudulent SBA loan. Each of the eight individuals indicted by the grand jury had at least one fraudulent PPP loan application. All of their PPP applications for different companies listed gross revenues of \$124,293. Davenport received two separate draws on his PPP loan. Davenport's PPP applications listed his company's gross revenues as \$124,293.

10. Three of the indicted conspirators in case number 23-CR-20253 were Jackson-Portwood, Timothy Boyle and Tyrone Boyle. Jackson-Portwood lived in Michigan but traveled regularly to California. Timothy and Tyrone Boyle are twin brothers and both live in California. Davenport's California Driver License lists his address as 721 East Hardy Street, Apartment 3, Inglewood, CA. Davenport's PPP

loan application listed his address as 721 East Hardy Street, Apartment 3, Inglewood, CA and his telephone number as 323-289-1644.

11. Telephone number 323-289-1644 and telephone number 323-490-0600, used by Timothy Boyle, had 460 events between May 17, 2021 and April 11, 2023 (events are typically generated through a voice call or text message). Telephone number 323-289-1644 and telephone number 310-993-1344, used by Tyrone Boyle, had 169 events between March 24, 2020 and April 11, 2023. Based on the number of events, I believe Davenport has a close association with the Boyles.

12. Telephone number 323-289-1644 (Davenport) and telephone number 248-954-7884, used by Jackson-Portwood, had 14 events. All of the calls and text messages occurred on April 19, 2021 and April 20, 2021. Davenport began the personal identification process – including submitting selfies and images of his government identification – for his PPP loan on April 19, 2021, continued on April 20, 2021, and was then approved on April 20, 2021. Davenport's PPP loan application and supporting 2019 Schedule C tax form listed gross revenue of \$124,293. On April 14, 2021, Tyrone Boyle's and Timothy Boyle's PPP loan applications were filed listing each of their company's gross revenues as \$124,293. Jackson-Portwood filed PPP loan applications for three companies, each company listed gross revenues of \$124,293.

13. When the DOL searched its database for UI claims filed from the same IP addresses as the EIDL loans, the DOL identified more than 1,000 UI claims. Approximately 149 of the same identities had been used to file both SBA loan applications and UI claims. The UI claims had been submitted to 17 states and the territory of Guam, although the vast majority of the claims were submitted to Michigan and California. Of the UI claims identified by the DOL, 108 of the claims listed 721 East Hardy Street, Apartment 3, Inglewood, CA as the claimant's address. This number includes both claims on which 721 East Hardy Street, Apartment 3 was listed when the claim was filed and claims on which the claimant's address was changed to 721 East Hardy Street, Apartment 3. The 108 claims were filed from an IP address in the Eastern District of Michigan. Typically, the State of California mailed a debit card containing the UI benefits to the claimant's address. Agents have not confirmed how many of the 108 claims had debit cards mailed to 721 East Hardy Street, Apartment 3. However, Bank of America provided ATM video footage of Timothy and Tyrone Boyle withdrawing UI benefits from approximately 71 different debit cards. The majority of the UI claims associated with those debit cards listed the claimant's address as 721 East Hardy Street, Apartment 3. I believe Davenport received debit cards and passed them on to the Boyles..

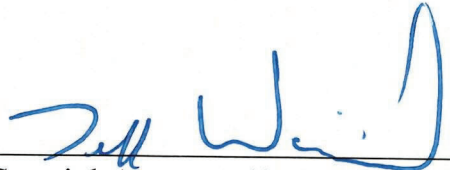
14. Agents executed search warrants at two Michigan residences and for



a Virtual Private Server (VPS) used by the conspirators. The searches found extensive lists of Personally Identifiable Information (PII) and SBA loan applications. For example, the FBI served Cloudzy with a search warrant for information on the VPS assigned IP address 108.177.235.171, which was used by the co-conspirators in furtherance of the scheme. Cloudzy provided files maintained on the VPS. The files included a text document titled "AllIEDD" with the PII for 153 people. The Employment Development Department (EDD) administers California's UI program. California UI claims had been filed for each of the 153 names. Everyone that Agents have interviewed from this list has stated that his or her identity was used without his or her permission. According to the DOL's database, 80 of the "AllIEDD" identities were used to file UI claims that listed the claimant's address as 721 East Hardy Street, Apartment 3.

### CONCLUSION

15. Based on the foregoing information, there is probable cause to believe that Davenport conspired to commit wire fraud, in violation of Title 18, United States Code § 1349.

  
Special Agent Jeffrey Weiland  
Federal Bureau of Investigation



Sworn to before me and signed in my  
presence and/or by reliable electronic means



August 30, 2023

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The Honorable R. Steven Whalen  
United States Magistrate Judge